



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-2007.0083

**FACILITY ID No.:** 077-00017

**AQCR:** 61

**CLASS:** SM80

**SIC:** 2037

**ZONE:** 12

**UTM COORDINATE (km):** 343.4, 4736.2

**1. PERMITTEE**

ConAgra Foods Lamb Weston, Inc.

**2. PROJECT**

Tier II Operating Permit renewal and Permit to Construct modification

**3. MAILING ADDRESS**

P.O. Box 489

**CITY**

American Falls

**STATE**

ID

**ZIP**

83211

**4. FACILITY CONTACT**

Robert Bloom

**TITLE**

Services Manager

**TELEPHONE**

(208) 226-2301

**5. RESPONSIBLE OFFICIAL**

Robert Schutte

**TITLE**

Operations Manager

**TELEPHONE**

(208) 226-2301

**6. EXACT PLANT LOCATION**

2975 Lamb-Weston Road, American Falls, ID 83211

**COUNTY**

Power

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Production of Frozen and Dehydrated Potato Products

**8. PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228 and IDAPA 58.01.01.400 through 470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit may expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

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TRACY DROUIN, PERMIT WRITER

DEPARTMENT OF ENVIRONMENTAL QUALITY

\_\_\_\_\_  
MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER

DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:**

Public Comment

**DATE MODIFIED/REVISED:**

**DATE EXPIRES:**

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## **List of Acronyms, Units, and Chemical Nomenclature**

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gal	Gallons
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMCF	million cubic feet
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
T/day	tons per day
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0083**

<b>Permittee:</b>	ConAgra Foods Lamb Weston, Inc.	<b>Facility ID No. 077-00017</b>
<b>Location:</b>	American Falls, Idaho	

**1. PERMIT SCOPE*****Purpose***

- 1.1 This Tier II operating permit is a Tier II renewal of Permit No. T2-040324. Additionally, the facility requested to increase Specialized Product Line No. 5 daily production maximum to 160 T/day and annual emissions to 52,770 tons per 12-month period. Other requests by the facility include changes to operating, monitoring, recordkeeping, and reporting requirements.
- 1.2 This Tier II operating permit and PTC renewal replaces Tier II Operating Permit No. T2-040324, issued March 8, 2005, the terms and conditions of which shall no longer apply.

***Regulated Sources***

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
3	Frozen Fried Product Line 1	Reyco Scrubber (2500)
4	Frozen Fried Product Line 2	Ducon Scrubber (UW-3)
5	Dehydrated (flake) Product Line	Ken Bratney Co. Kice 21-8 Dust Collector Pneumafil Corporation Fabric Filter (6.5-92-6) Mikro-Pulsaire Filter
6	Boilers No. 1, No. 2, No. 3, No. 4	None
7	Specialized Product Lines No. 3, and No. 5	Reyco Scrubbers

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## **2. FACILITY-WIDE CONDITIONS**

### ***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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***Odors***

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

***Open Burning***

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-617, Rules for Control of Open Burning.

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### ***Reports and Certifications***

- 2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Pocatello Regional Office  
444 Hospital Way #300  
Pocatello, ID 83201  
Phone: (208) 236-6160  
Fax: (208) 236-6168

### ***Obligation to Comply***

- 2.11 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

### ***Fuel-burning Equipment***

- 2.12 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

### ***Sulfur Content***

- 2.13 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
  - ASTM Grade 2 fuel oil - 0.5% by weight.
  - ASTM Grades 4, 5, and 6 fuel oil – 1.75% by weight.
- 2.14 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.
- 2.15 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

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## ***Fuel Burning Operating Requirements***

- 2.16 The combined combustion of all fuels from all sources shall not cause oxides of nitrogen (NO<sub>x</sub>) or carbon monoxide (CO) to be emitted to the atmosphere in quantities greater than 99 tons per year (T/yr) for each pollutant for any consecutive 12-month period.

## ***Fuel Consumption Monitoring and Recording***

- 2.17 The permittee shall monitor and record the calendar date and total amount of natural gas burned at the entire facility per month and per any consecutive 12-month period. The records shall be retained at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 2.18 The permittee shall calculate and record monthly the NO<sub>x</sub> and CO emissions for the previous consecutive 12-month period to ensure NO<sub>x</sub> and CO emissions do not exceed 99 T/yr. The records shall be submitted to DEQ every 12 months by January 31, retained at the facility for the most recent five-year period, and be made available to DEQ representatives upon request.
- 2.19 NO<sub>x</sub> calculations shall be made using the following table:

**Table 2.1 NO<sub>x</sub> EMISSIONS CALCULATIONS**

Sources	Fuel Usage (previous 12 months)	Emission Factor <sup>a</sup>	Emissions
Boiler No. 1 Natural Gas	MMCF <sup>b</sup> x	45 lb/MMCF =	lbs
Rest Of The Plant Natural Gas	MMCF x	100 lb/MMCF =	lbs
Boiler No. 1 Diesel	Gallons x	10 lb/1000 gal =	lbs
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	20 lb/1000 gal =	lbs
Boiler No. 1 Vegetable Oil	Gallons x	12.5 lb/1000 gal =	lbs
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	25 lb/1000 gal =	lbs
Total =			lbs
			Tons

<sup>a</sup> The permittee shall use the associated emission factors listed in the table or a DEQ approved alternative emission factor

<sup>b</sup> Million cubic feet

- 2.20 CO calculations shall be made using the following table:

**Table 2.2 CO EMISSIONS CALCULATIONS**

Sources	Fuel Usage (previous 12 months)	Emission Factor <sup>a</sup>	Emissions
Boiler No. 1 Natural Gas	MMCF <sup>b</sup> x	84 lb/MMCF =	lbs
Rest of the Plant Natural Gas	MMCF x	84 lb/MMCF =	lbs
Boiler No. 1 Diesel	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 1 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs
Total =			lbs
			Tons

<sup>a</sup> The permittee shall use the associated emission factors listed in the table or a DEQ approved alternative emission factor

<sup>b</sup> Million cubic feet



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### 3. FROZEN FRIED PRODUCT LINE 1

#### 3.1 Process Description

A predetermined blend of clean, raw potatoes are drawn from the holding bays and are sized and peeled. The peeled potatoes are then trimmed, preheated, cut, wet-graded, sorted, and then fed to the defect-removal equipment, where defective material is removed and routed to the hopper waste. Undersized cuttings are routed to the dehydrated flake product line.

The sorted product is blanched in hot water then fed to a steam-heated dryer, from which it leaves in a "nearly dry" state. From the dryer, the potato product goes to the fryer, then to a freeze tunnel and frozen graders. Finally, the product goes to packaging, after which it is placed on pallets and then put in cold storage.

Emissions from the Frozen Fried Product Line 1 fryer exit the process through a Reyco scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The blancher and the peeler vent only process steam.

#### 3.2 Emission Control Description

##### Frozen Fried Product Line 1 Steam-heated Dryers

Emissions from the steam-heated dryers are uncontrolled.

##### Frozen Fried Product Line 1 Deluge Fryer

Emissions from the Frozen Fried Product Line 1 deluge fryer are controlled by a scrubber with the following specifications:

Manufacturer:	Reyco
Model Number:	2500
Max. Inlet Flow Rate:	17,500 acfm
Max. Outlet Flow Rate:	16,000 acfm
Pressure Drop:	0.5 to 3.5 inch water

#### ***Emission Limits***

#### 3.3 Emission Limits – PM<sub>10</sub>

Emissions of PM<sub>10</sub> from the Frozen Fried Product Line 1 Reyco scrubber shall not exceed the limits listed in Table 8.1 of this permit.

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## ***Operating Requirements***

### **3.4 Throughput Limits**

Frozen Fried Product Line 1 shall not exceed a total maximum output of 945 T/day, and 301,905 tons per any consecutive 12-month period.

### **3.5 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications or the operations and maintenance (O & M) manual, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media pressure to the air pollution control equipment.

### **3.6 Operations and Maintenance Manual Requirements**

The O&M manual for the air pollution control device, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain on site at all times and shall be made available to DEQ representatives upon request.

### **3.7 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control device shall be maintained within manufacturer's or O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

### **3.8 Scrubbing Media Pump Pressure**

The scrubbing media pump pressure to the air pollution control devices shall be maintained within manufacturer's or O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

### **3.9 Scrubber Operation**

The associated Reyco scrubber shall be operated at all times while Frozen Fried Product Line 1 is in operation.

## ***Monitoring and Recordkeeping Requirements***

### **3.10 Throughput Monitoring and Recordkeeping**

The permittee shall monitor and record, both daily and annually, the finished potato product output of Frozen Fried Product Line 1 to demonstrate compliance with Permit Condition 3.4. Throughput shall be recorded as T/day and tons per consecutive 12-month period. The throughput for each day may be

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determined using monthly throughput information. Records of the most recent five-year period shall be retained on site and shall be made available to DEQ representatives upon request.

### 3.11 **Air Pollution Control Equipment Monitoring and Recordkeeping**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept on site, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once weekly.
- The scrubbing pump pressure to the air pollution device, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

## ***Performance Test***

### 3.12 **PM<sub>10</sub> Performance Tests**

The permittee shall conduct a performance test to measure PM<sub>10</sub> emissions from the Frozen Fried Product Line 1 deluge fryer stack within 180 of permit issuance, and at least once every five years thereafter to demonstrate compliance with PM<sub>10</sub> emissions limits. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 6, and the following requirements:

- The Frozen Fried Product Line 1 deluge fryer shall be operated at normal production rates during the performance tests
- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.
- The pressure drop across the scrubber controlling emissions for the Frozen Fried Product Line 1 deluge fryer shall be recorded every 15 minutes during each performance test run
- The throughput of finished potato product from the Frozen Fried Product Line 1 deluge fryer expressed as tons per hour, shall be recorded during each performance test run.

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**4. FROZEN FRIED PRODUCT LINE 2****4.1 Process Description**

Raw potatoes are cleaned, sized, and peeled by a steam peeler. The peeled potatoes are then trimmed, cut, wet-graded, sorted, and passed through defect removal equipment, then blanched (partially cooked) by immersion in hot water. A natural gas-fired dryer then dries potato products. From the dryer, the products are transferred to the Dehydrated Product Line 2 fryer. Immediately after frying, the product is frozen, graded, packaged, and stored in a warehouse.

Emissions from the Frozen Fried Product Line 2 fryer exit the process through a Ducon scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The peeler and blancher vent only process steam.

**4.2 Control Description****Frozen Fried Product Line 2 Natural Gas-fired Dryers**

Emissions from the Frozen Fried Product Line 2 natural gas-fired dryer are uncontrolled.

**Frozen Fried Product Line 2 Deluge Fryer**

A scrubber with the following specifications controls emissions from the Frozen Fried Product Line 2:

Manufacturer:	Ducon
Model Number:	UW-3, Size 90
Max. Inlet Flow Rate:	26,000 acfm
Max. Outlet Flow Rate:	23,794 acfm
Pressure Drop:	0.0 to 1.0 inch water
Wet Scrubber Flow:	20 to 60 gpm

***Emissions Limits*****4.3 Emission Limits-PM<sub>10</sub>**

Emissions of PM<sub>10</sub> from the Frozen Fried Product Line 2 Ducon scrubber shall not exceed any limits listed in Table 8.1 of this permit.

***Operating Requirements*****4.4 Throughput Limits**

Frozen Fried Product Line 2 shall not exceed a total maximum output of 510 T/day and 167,790 tons per any consecutive 12-month period.

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**4.5 Fuel Specification**

The Frozen Fried Product Line 2, dryer (natural gas-fired), shall burn natural gas exclusively.

**4.6 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer's specifications or the O & M manual, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

**4.7 Operations and Maintenance Manual Requirements**

The O&M manual for the air pollution control device, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**4.8 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control devices shall be maintained within manufacturer's or O&M manual specifications. Documentation of both the manufacturer's and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

**4.9 Scrubbing Media Flow Rate**

The scrubbing media flow rate to the air pollution control devices shall be maintained within manufacturer's or O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

**4.10 Ducon Scrubber Operation**

The associated Ducon scrubber shall be operated at all times when Frozen Fried Product Line 2 is operated.

***Monitoring and Recordkeeping Requirements*****4.11 Throughput Monitoring and Recordkeeping**

The permittee shall monitor and record, both daily and annually, the finished potato product output of Frozen Fried Product Line 2 to demonstrate compliance with Permit Condition 4.4. Throughput shall be recorded as T/day and tons per consecutive 12-month period. The throughput for each day may be determined using monthly throughput information. Records of the most recent five-year period shall be retained onsite and shall be made available to DEQ representatives upon request.

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#### 4.12 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once weekly.
- The scrubbing media flowrate to the air pollution device, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

## **5. DEHYDRATED (FLAKE) PRODUCT LINE: DRUM DRYERS 1 AND 2, KICE FILTER, PNEUMAFIL FILTER, AND MIKRO-PULSAIRE FILTER**

### **5.1 Process Description**

Raw potato screen-out, hydro-sieve and the undersized cuttings from Dehydrated Product Line 1 are routed to the flake holding tank. From the holding tanks, raw potatoes are transferred to the flake blancher, flake chiller, then cooked in the flake cooker where steam is injected and additives are introduced.

The cooked product is ground to a mash and fed to one of two drum dryers, where it is rolled into a fine sheet of dehydrated potato. The sheet is broken into smaller portions, transported through one of two cyclones, and then is either put into a tote for later use or run to a hammer mill. The hammer mill grinds the dehydrated product to the desired coarseness for either potato flakes or flour. From the hammer mill, the product passes to the Kice collection system where different densities are separated for packaging.

### **5.2 Control Description**

#### Drum Dryer No. 1 and Drum Dryer No. 2

Emissions from both of the drum dryers are uncontrolled.

#### Kice Collection/Sizing System

Emissions from the Kice collection system (flake sizing) are controlled by the Kice fabric filter with the following specifications:

Manufacturer:	Ken Bratney Co.
Model:	Kice 21-8 Dust Collector
Air/Cloth Ratio:	7.9 to 1

#### Packaging System

Fugitive emissions from the packaging system and the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:	Pneumafil Corporation
Model:	6.5-92-6
Air/Cloth Ratio:	8.0 to 1

#### Micro-Pulsair

Fugitive emissions from the hammer mill area of the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:	Pulverizing Machinery
Model:	Mikro-Pulsaire Dust Collector
Air/Cloth Ratio:	8.0 to 1

## ***Emissions Limits***

### **5.3 Emission Limits-PM<sub>10</sub>**

Emissions of PM<sub>10</sub> from the Kice, Pneumafil, and Mikro-Pulsaire fabric filters shall not exceed the limits specified in Table 8.1 of this permit.

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### ***Operating Requirements***

#### **5.4 Throughput Limits**

The Dehydrated Product Line shall not exceed a total maximum output of 50 T/day and 16,650 tons per any consecutive 12-month period.

#### **5.5 Filter Operation**

The Kice, Pneumafil, and Mikro-Pulsaire filters shall at all times be maintained in good working order and shall be operated as efficiently as practical.

#### **5.6 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment.

#### **5.7 Operations and Maintenance Manual Requirements**

- The permittee shall develop an O&M manual for the Kice, Pneumafil, and Mikro-Pulsaire filters, which will be followed to demonstrate that the filters are operated as efficiently as practical. The manuals shall include operating pressure drop requirements.
- The O&M manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to DEQ representatives upon request.

#### **5.8 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control devices shall be maintained within manufacturer or O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

### ***Monitoring and Recordkeeping Requirements***

#### **5.9 Throughput Monitoring and Recordkeeping**

The permittee shall monitor and record, both daily and annually, the finished potato product output of Dehydrated Product Line to demonstrate compliance with Permit Condition 5.4. Throughput shall be recorded as T/day and tons per consecutive 12-month period. The throughput for each day may be determined using monthly throughput information. Records of the most recent five-year period shall be retained onsite and shall be made available to DEQ representatives upon request.



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#### 5.10 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control devices, once weekly.
- Maintenance on the air pollution control devices and any modifications made to the operating specifications, as performed.

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**6. BOILER NO. 1, BOILER NO. 2, BOILER NO. 3, BOILER NO. 4, AMUS, AND SPACE HEATERS****6.1 Process Description**

There are three boilers for the supply of the facility's process steam and one boiler for heat supply to the facility's fire system water source to prevent freezing during winter.

There are various sizes of air makeup units (AMUs) and other space heating equipment.

**6.2 Control Description**

Emissions from Boilers No. 1, No. 2, No. 3, and No. 4 are uncontrolled.

Emissions from the AMUs and space heating equipment are uncontrolled.

***Emissions Limits*****6.3 Boilers Nos. 1, 2, 3 and 4 Emissions Limit**

Emissions from the boiler exhaust stacks shall not exceed the emissions limits listed in Table 8.1 of this permit.

**6.4 Emissions Limit-PM**

Emissions limits of PM from Boiler No. 1, Boiler No. 2, Boiler No. 3, and Boiler No. 4 exhaust stacks shall not exceed 0.015 gr/dscf corrected to 3% oxygen by volume when burning natural gas, or 0.050 gr/dscf of effluent gas adjusted to 3% oxygen when diesel or vegetable oil is combusted as per IDAPA 58.01.01.675.

***Operating Requirements*****6.5 Boilers No. 1, No. 2, No. 3, and No. 4 Fuel Specification**

Boilers No. 1, No. 2, No. 3, shall burn natural gas, 0.05% diesel fuel with 0.05% sulfur or less, or vegetable oil. Boiler No. 4 shall burn natural gas exclusively.

**6.6 AMUs and Space Heating Equipment Fuel Specification**

All AMUs and space heating equipment shall burn natural gas fuel exclusively.

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## ***Monitoring and Recordkeeping Requirements***

### **6.7 Fuel Consumption Monitoring and Recordkeeping**

The permittee shall monitor and record the following parameters to verify compliance with the permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.

- Calendar date and total amount of natural gas burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
- Calendar date and amount of vegetable oil burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
- Calendar date and amount of diesel burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.

### **6.8 Operation Parameters Monitors**

The permittee shall record the parameters required in Permit Conditions 6.7, 2.19 and 2.20 to verify compliance with this permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.

## ***Performance Test***

### **6.9 PM<sub>10</sub> Performance Tests**

The permittee shall conduct a performance test to measure PM<sub>10</sub> from the Boiler No.1 stack while burning only vegetable oil within 180 days of installation of the capability to burn vegetable oil, and at a minimum of once every five years thereafter. The permittee shall use the results of the PM<sub>10</sub> performance tests to establish a PM<sub>10</sub> emissions factor that shall be used to estimate emissions from each boiler at the facility when burning vegetable oil and to determine compliance with the PM<sub>10</sub> emissions limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 9 of this permit, and the following requirements:

Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.

The amount of vegetable oil burned during the test and the steam output of Boiler No.1 shall be recorded during each performance test.

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## 7. SPECIALIZED PRODUCT LINE 3 AND LINE 5

### 7.1 Process Description

Raw potatoes from the even-flow hoppers are routed to a steam peeler and barrel washer to remove the peelings. The potatoes are then inspected, scrubbed, polished, and cut. After cutting, the potatoes are blanched and then dried or retrograded.

Specialized Product Line 3 products pass through a steam-heated retrograde which may be operated to dry the product, and may pass through a natural gas-fired roaster depending on the product being produced.

Specialized Product Line 5 products pass through a natural gas heated retrograde which is operated to dry the product, and then pass through two natural gas-fired fryers that operate in parallel.

The specialized products are then sent to a freeze tunnel. After freezing, the specialized products are sorted, packaged, placed on pallets, and then sent to the cold storage area.

The peeler and the blancher vent only process steam.

### 7.2 Control Description

#### Specialized Product Line 3 Retrograde

Emissions from the Specialized Product Line 3 retrograde are uncontrolled.

#### Specialized Product Line 3 Roaster

Emissions from the Specialized Product Line 3 roaster are uncontrolled.

#### Specialized Product Line 5 Retrograde

Emissions from the Specialized Product Line 5 retrograde are uncontrolled.

#### Specialized Product Line 5 Fryer 1

Emissions from the Specialized Product Line 5 fryer 1 are controlled by a scrubber with the following specifications:

Manufacturer:	Reyco
Model Number:	Type W Roto-Clone
Max. Outlet Flow Rate:	2,800 acfm
Pump Pressure:	60 to 90 psi

#### Specialized Product Line 5 Fryer 2

Emissions from the Specialized Product Line 5 fryer 2 are controlled by a scrubber with the following specifications:

Manufacturer:	Reyco
Model Number:	Type W Roto-Clone
Max. Outlet Flow Rate:	2,800 acfm
Pump Pressure:	60 to 90 psi

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***Emissions Limits*****7.3     Emission Limits-PM<sub>10</sub>**

Emissions from the Line 3 and Line 5 Fryer Reyco stacks shall not exceed the limits specified in Table 8.1 of this permit.

***Operating Requirements*****7.4     Throughput Limits**

- Specialized Product Line No. 3 shall not exceed a total maximum output of 265 T/day and 87,400 tons per any consecutive 12-month period.
- Specialized Product Line No. 5 shall not exceed a total maximum output of 160 T/day and 52,770 tons per any consecutive 12-month period.

**7.5     Fuel Types**

The Specialized Product Line 3 roaster, Specialized Product Line 5 retrograde and Specialized Product Line 5 fryers 1 and 2 shall burn natural gas exclusively.

**7.6     Scrubbing Media Pump Pressure**

- The scrubbing media pump pressure to the Reyco wet scrubbers shall be maintained within the O&M Manual specifications.
- Documentation of the O&M Manual scrubbing media pump pressure requirements shall be kept on site and shall be made available to DEQ representatives upon request.

**7.7     Reyco Scrubber Operation**

The associated Reyco scrubbers shall be operated at all times whenever Specialized Product Line 5 fryers 1 and/or 2 are operated.

***Monitoring and Recordkeeping Requirements*****7.8     Throughput Monitoring and Recordkeeping**

The permittee shall individually monitor and record, both daily and annually, the finished potato product output of Specialized Product Lines 3 and 5 to demonstrate compliance with Permit Condition 7.4. Throughput shall be recorded as T/day and tons per consecutive 12-month period. The throughput for each day may be determined using monthly throughput information. Records of the most recent five-year period shall be retained onsite and shall be made available to DEQ representatives upon request.

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## 7.9 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- The scrubbing pump pressure to the air pollution devices, once weekly.
- Maintenance on the air pollution control devices and any modifications made to the operating specifications, as performed.

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## 8. SUMMARY OF EMISSION RATE LIMITS

**Table 8.1 EMISSION LIMITS**  
**Lamb Weston, Inc. – American Falls**  
**Hourly (lb/hr<sup>1</sup>) and Annual (T/yr<sup>2</sup>) Emissions Limits<sup>3</sup>**

Source Description	Hourly PM <sub>10</sub> <sup>4</sup> Emissions (lb/hr)	Annual PM <sub>10</sub> <sup>4</sup> Emissions (T/yr)	NO <sub>x</sub> <sup>5</sup>		CO		VOC <sup>6</sup>		SO <sub>2</sub> <sup>7</sup>	
			lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler No. 1- Natural Gas Combustion	0.734	3.21								
Vegetable Oil Combustion	1.281	5.61								
Diesel (Distillate No. 1 or 2) Combustion	1.654	7.24								
Boiler No. 2 - Natural Gas Combustion	0.352	1.54								
Vegetable Oil Combustion	0.613	2.69								
Diesel (Distillate No. 1 or 2) Combustion	0.792	3.47								
Boiler No. 3 - Natural Gas Combustion	0.348	1.52								
Vegetable Oil Combustion	0.607	2.66								
Diesel (Distillate No. 1 or 2) Combustion	0.784	3.44								
Boiler No. 4 - Natural Gas only	0.019	0.03								
Line 2 Dryer	1.50	5.97								
Line 3 Roaster	0.06	0.24								
Line 3 Retrograde	0.70	2.78								
Line 5 Retrograde	0.46	1.83								
Line 1 Dryer	2.50	9.89								
Flake Dryer 1 & 2	0.13	0.53								
Line 1 Reyco Scrubber	3.94	15.55								
Line 2 Ducon Scrubber	2.13	8.39								
Line 5 Fryer/scrubber 1	0.70	2.80								
Line 5 Fryer/scrubber 2	0.70	2.80								
Kice filter	0.07	0.29								
Pneumafil filter	0.30	1.17								
Mikro-Pulsaire filter	0.15	0.58								
AMUs & space heaters										
<b>Facility Wide Emission Limit<sup>8,9</sup></b>				<b>99.00</b>		<b>99.00</b>				

<sup>1</sup> Pounds per hour

<sup>2</sup> Tons per year

<sup>3</sup> As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or DEQ's emissions estimation methods used in the permit application analysis.

<sup>4</sup> Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns

<sup>5</sup> Nitrogen oxides

<sup>6</sup> Volatile organic compound

<sup>7</sup> Sulfur dioxide

<sup>8</sup> Carbon monoxide (CO) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

<sup>9</sup> Nitrogen oxides (NO<sub>x</sub>) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

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## 9. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT GENERAL PROVISIONS

### *General Compliance*

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act.

**[Idaho Code §39-101, et seq.]**

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 405, 5/1/94]**

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 406, 5/1/94]**

### *Inspection and Entry*

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

### *Construction and Operation Notification*

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:



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- a. A notification of the date of initiation of construction, within five working days after occurrence;
- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

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[IDAPA 58.01.01.211, 405, 5/1/94]

### ***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### ***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### ***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### ***Expiration and Renewal***

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.

[IDAPA 58.01.01.209.04, 7/1/02]

### ***Transferability***

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06 and 404.05.

[IDAPA 58.01.01.209.06, 404.05, 4/11/06]

### ***Severability***

14. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.